

# EXHIBIT L

**HAYDEN N. WYATT**  
*Curriculum Vitae*  
*and*  
*Support for Appointment as*  
*Personal Injury Plaintiffs' Steering Committee*

**A. Personal Information:**

Name: Hayden N. Wyatt  
 Law Firm: Bailey Cowan Heckaman PLLC ([www.bchlaw.com](http://www.bchlaw.com))  
 Years of Practice: 2  
 List of Firm Cases Transferred to MDL:

*Oatridge, et al. v. Future Motion, Inc.*, No. 5:21-cv-09906-BLF, in the United States District Court for the Northern District of California.

*Bunnell, et al. v. Future Motion, Inc.*, No. 5:23-cv-06623-BLF, in the United States District Court for the Northern District of California.

**B. Position(s) Sought:**

Plaintiffs' Steering Committee.

**C. MDL Experience:**

MDL Name	Subject Matter & Current Status	"Unofficial" Roles Played
MDL 2789 <b><i>In re: Proton Pump Inhibitor Litig.</i></b> , D.N.J.	Newark, N.J.-based MDL involving kidney-related injuries linked to proton pump inhibitor (heartburn) drugs; MDL is ongoing	Performed PSC-delegated legal research and writing (see § D for more detail)
MDL 2885 <b><i>In re: 3M Combat Arms Earplug Prods. Liab. Litig.</i></b> , N.D. Fla.	Pensacola, Fla.-based MDL involving military veterans suffering hearing damage from faulty combat arms earplugs (largest MDL in history); MDL is ongoing.	Served as briefing attorney for bellwether trial case that reached jury verdict (see § D for more detail)

**D. Mass Tort Experience:**

Since joining BCH in October 2021, Hayden's practice has exclusively focused on litigation with a substantial emphasis on law and briefing in mass tort and individual personal injury litigation. From the beginning of his legal career, Hayden has served as a member of various law and briefing teams.

In his first months as a lawyer, Hayden worked as a member of a law and briefing team for a bellwether plaintiff in *In re Proton Pump Inhibitor Litig.* In this role, Hayden was tasked with drafting portions of briefs in response to defendants' motions for summary judgment and specific and general causation *Daubert* motions.

Hayden's most significant mass tort experience involved MDL 2885, *In re 3M Combat Arms Earplug Products Liability Litigation*. Hayden assisted numerous clients proceed through a court-ordered "discovery wave" process by responding to case-specific written discovery and taking and defending various fact and expert witness depositions. Hayden drafted *Daubert* motions and responses to defendants' *Daubert* motions for "wave" clients and assisted in the drafting of motions for and response to summary judgment. He also conducted choice-of-law meet-and-confers on behalf of the firm's "wave" clients. In the handful of cases where the parties were unable to agree on the applicable state law and remand venue, he drafted significant portions of his firm's memorandums on choice-of-law. In addition, Hayden served as a briefing attorney for a bellwether trial case that reached a jury verdict. In that role, he assisted in drafting plaintiff's response to defendants' motion for directed verdict and various trial briefs throughout trial.

Prior to centralization (in both state and federal court), Hayden drafted nearly three dozen Onewheel-related complaints and drafted written discovery requests and responses in almost half of those cases. He also attended joint safety gear inspections. Hayden also drafted considerable portions of his firm's client's initial opposition to defendant's motion for centralization before the JPML.

Recently, Hayden was appointed to the Law and Briefing Subcommittee of Judicial Council Coordination Proceeding (JCCP) No. 5305, *In re Future Motion Onewheel Cases*. JCCP No. 5305 is the California state court equivalent to federal MDL No. 3087. In this role, Hayden is expected to conduct various legal research and writing with other members of the law and briefing subcommittee concerning common issues applicable to all JCCP plaintiffs.

**E. Law and Briefing Experience:**

In addition to his work in mass tort litigation, Hayden has served as counsel in or as a briefing attorney in various individual personal liability and commercial litigation cases.

BCH represented a nationally recognized designer and retailer of outdoor adventure apparel, in successfully prosecuting claims concerning the breach of a licensing agreement and violations of the Texas Uniform Trade Secrets Act. BCH's law and briefing team successfully defeated a motion to dismiss. Hayden oversaw the review and production of hundreds of thousands of pages of responsive documents. He also assisted in the mediation of the case, which ultimately laid the foundation for settlement. Hayden participated in the review and drafting of the parties' settlement agreement.

Hayden has also represented numerous clients asserting violations of the Fair Labor and Standards Act's minimum wage and overtime pay requirements. In those representations, he had occasion to draft complaints, discovery requests and responses, a motion for conditional certification of the collective action, and various settlement agreements.

Hayden has also served as a briefing attorney for BCH's asbestos litigation and personal injury litigation departments. He has successfully briefed motions for remand, including a case that involved an open legal question as to the applicability of the forum defendant rule to cases where claims of fraudulent joinder were made. As a briefing attorney, Hayden has also drafted responses to motions for summary judgment and various discovery-related motions.

BCH also represented the victims of a boat explosion on the Lake of the Ozarks. Hayden participated in the mediation of the case in its early stages. He successfully drafted extensive portions of plaintiffs' opposed motion for intra-district transfer. He also drafted overwhelming portions of plaintiffs' *Daubert* motions, responses to defendants' *Daubert* motions, plaintiffs' motions *in limine*, responses to motions *in limine* (including the issue of other similar instances), and plaintiffs' written response to a motion for directed verdict. At trial, Hayden served as a trial briefing attorney. The case reached a jury verdict.

**F. Curriculum Vitae:****—EDUCATION—****University of Arkansas School of Law, Fayetteville, AR**

Juris Doctor, May 2021 GPA 3.137

- Board of Advocates, Trial Competition Chair | 2020-2021
- W.J. Arnold Memorial Award Recipient (Most Promising Trial Attorney) | 2021
- Texas Young Lawyers Association Traveling Trial Team | 2020

- American Association for Justice Student Trial Advocacy Competition Traveling Trial Team | 2021

**University of Arkansas**, GPA 3.517

Bachelor of Arts in History and Political Science, May 2018

— LEGAL EXPERIENCE —

October 2021 to  
Present

**Bailey Cowan Heckaman PLLC**, Houston, Texas, *Associate*

- See information above.